REMARKS

Introduction

Claims 1–18 and 26–32 are currently pending in the present application. By this response claims 1, 6, 12, 26, and 32 have been amended. Please note that the following remarks are not intended to be an exhaustive enumeration of the distinctions between any cited references and the claimed invention. Rather, the distinctions identified and discussed below are presented solely by way of example to illustrate some of the differences between the claimed invention and the cited references. In addition, Applicants request that the Examiner carefully review any references discussed below to ensure that Applicants understanding and discussion of the references, if any, is consistent with the Examiner's understanding. Reconsideration of the application is respectfully requested in view of the above amendments to the claims and the following remarks. For the Examiner's convenience and reference, Applicant's remarks are presented in the order in which the corresponding issues were raised in the Office Action.

Rejections Under 35 U.S.C. § 103

The Office Action mailed March 17, 2006 rejects claims 1–8, 10–18, 26–29, and 32 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,456,699 (*Burg*) in view of U.S. Patent No. 5,815,153 (*Isensee*). The heading under item no. 3 of the Office Action does not indicate that claims 30 and 31 are rejected, however, that section addresses those claims. Applicant assumes that the Examiner intended to reject claims 30 and 31 over *Burg* and *Isensee*. Claim 9 is rejected as being unpatentable over *Burg* and *Isensee* in view of U.S. Patent No. 6,157,841 (*Bolduc*).

The applied references fail to teach or suggest a system including a "voice browser being configured to convert the signal directly after the first access device generates the signal," as recited in claims 1, 6, and 26; a method including, a "first signal being converted directly after the first numeric touchpad generates the signal," as recited in claim 12; or a computer program including, "input being converted directly after the first access device generates the signal," as recited in claim 32. Support for this feature can be found, for example, at page 12, lines 5–16 and at page 19, lines 13–22 of the present application.

In the claimed system and method, the user selects a key on the touchpad that generates a

signal, which is converted at that time into HTML code that is correlated with specified classes of information using the correlation data structure. When the corresponding icon on the second access device is selected, it causes the second access device to generate the same HTML code that is identified using a correlation data structure with the same request for the same specified class of information. In particular, the first signal is converted into HTML code to correlate it with specified classes of information.

Burg fails to disclose this feature. *Burg* instead teaches an IVR menu structure that has been previously developed. See col. 5, lines 64–67. In *Burg*, the system down-loads the URL links for each given level menu page to use in an IVR database. See col. 6, lines 35–36 and col. 7, lines 9–12. An IVR menu architecture is created and reviewed by an operator, then an IVR outline is created. Col. 7, lines 25–30. Once the IVR menu structure, prompts, and responses are developed, the system's initial translation is complete. Col. 7, lines 50–51.

Burg uses an entirely different format—an IVR architecture. The selected choice from the IVR menu is matched with a previously down-loaded Web page that was converted into the IVR architecture. Thus, the comparison occurs between IVR formats.

Burg does not teach converting the signal directly after it was received into HTML code, as required by the claims, to correlate it with specified classes of information using a correlation data structure.

The Office Action attempts to overcome the deficiencies of *Burg* by citing *Isensee*. *Isensee* does not teach a telephone object that generates HTML code, but specifies that the telephone object work in much the same way as a physical telephone. Thus, the telephone object of *Isensee* does not make-up for the deficiencies.

For at least these reasons, neither *Burg* or *Isensee* alone or in combination teach or suggest a system or method including a voice browser that is configured to convert the signal directly after the first access device generates the signal.

Accordingly, Applicant respectfully asserts that the rejections under 35 U.S.C. §103 should be withdrawn because the applied references, either individually or in combination, do not teach or suggest each feature of independent claims 1, 6, 12, 26, and 32.

As pointed out in MPEP §2143.03, "[t]o establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 409 F.2d 981, 180 USPQ 580 (CCPA 1974)."

For at least these reasons, claims 1, 6, 12, 26, and 32 are believed to be in condition for allowance. The dependent claims, namely claims 2–5, 7–11, 13–18, and 27–31, are also in condition for allowance for at least the same reasons, as well as for the additional features they recite.

Conclusion

In view of the foregoing, Applicant believes the claims are in allowable form. In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, or which may be overcome by an Examiner's Amendment, the Examiner is requested to contact the undersigned attorney.

Dated this 18th day of September, 2006.

Respectfully submitted,

/Carl T. Reed/ Reg. #45454

CARL T. REED
Registration No. 45,454
Attorney for Applicant
Customer No. 022913
Telephone: (801) 533-9800

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